



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

March 24, 2023

Hon. Gabriel W. Gorenstein, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

**Re: In re: New York City Policing During Summer 2020 Demonstrations,
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases**

Dear Judge Gorenstein:

I write on behalf of the non-stayed Plaintiffs in the consolidated cases above in response to the Court's order (Dkt. 897) setting a deadline of March 28, 2023, for Plaintiffs to file a motion seeking to preclude Defendants from relying on the facts or subject matter of any material withheld pursuant to the law enforcement investigative privilege. I write to submit a proposed briefing schedule pursuant to Rule 2.B of the Court's Individual Practices (requiring the parties to agree on a reasonable briefing schedule) and, pursuant to Rule 1.E, to respectfully request a two-week extension of time to submit Plaintiffs' opening papers.

Plaintiffs have conferred with Defendants who consent to Plaintiffs' request and proposed briefing schedule. The parties accordingly propose the following briefing schedule:

- Plaintiffs' opening motion due: April 11, 2023
- Defendants' opposition papers due: April 25, 2023
- Plaintiffs' reply papers due: May 2, 2023.

This is Plaintiffs' first request for an extension of time to file a motion on this issue. I thank Your Honor for your consideration of this request.

Respectfully Submitted,

/s/ Swati Prakash

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CC: All counsel of record (via ECF)